

EXHIBIT 2



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

CJ 15-2841
Andrew
DISTRICT COURT
OKLAHOMA COUNTY

ANGELA DIANE NEWNAM,

Plaintiff,

vs.

PROGRESSIVE NORTHERN INSURANCE
COMPANY,

Defendant.

Case No.

MAY 19 2015

CLERK OF DISTRICT COURT

OKLAHOMA COUNTY

PETITION

CJ-2015 -2841

COMES NOW the Plaintiff, Angela Newnam, and for her cause of action against the Defendant, Progressive Northern Insurance Company, (hereinafter referred to as "Progressive"), alleges and states as follows:

1. That on or about the 9th day of October, 2012, the Plaintiff, Angela Newnam, was driving a van for Happy Times Child Development when another vehicle collided with the vehicle being driven by Angela Newnam. As a result of this collision, the Plaintiff, Angela Newnam, suffered severe personal injuries.
2. The vehicle which caused the collision described herein driven and operated by Crystal Dawn Mantle, was insured with Liberty Mutual Insurance Company.
3. The Defendant, Progressive, provides automobile insurance coverage for Happy Times Child Development pursuant to policy number 04633531-2. According to the terms and conditions of the insurance policy, the Defendant provides uninsured/underinsured motorist coverage.
4. That the collision described herein was the result of the negligence of Crystal Dawn Mantle, in that she:
 - (a) Failed to use reasonable and proper care in the operation of her motor vehicle;
 - (b) Failed to devote full time and attention to her driving;
 - (c) Failed to keep a proper look out;

- (d) Was operating his motor vehicle in a manner that was not reasonable and proper, and
- (e) Failed to yield for oncoming traffic before pulling from a private drive.

5. As a result of the occurrence described herein, the Plaintiff, Angela Newnam, suffered severe personal injuries. As a result of said personal injuries the Plaintiff, Angela Newnam, has incurred medical expenses in the past, and will continue to do so in the future, and has experienced physical pain and anguish in the past and will, in all reasonable probability, continue to do so in the future by the nature and severity of her injuries. Plaintiff has suffered loss of earnings and impaired earning capacity.

8. By reason of the above and foregoing, the Plaintiff, Angela Newnam, has been damaged in an amount in excess of TEN THOUSAND DOLLARS (\$10,000.00) for costs of this action and for such and further relief as the Court deems just and proper.

WHEREFORE, the Plaintiff, Angela Newnam, prays for judgment against the Defendant, Progressive Insurance, and for a total sum in excess of Ten Thousand Dollars (\$10,000.00), costs of this action and for such other and further relief as the Court deems just and proper.

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JURY TRIAL DEMANDED